1 2 3 4 5	Josh A. Cohen (SBN 217853) CLARENCE DYER & COHEN LLP 899 Ellis St. San Francisco, CA 94109 Tel: (415) 749-1800 Fax: (415) 749-1694 jcohen@clarencedyer.com Attorney for Defendant	
6	SOK WA CHONG VISEU	
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9	UNITED STATES DISTRICT COURT	
10	NORTHERN DISTRICT OF CALIFORNIA	
10	SAN FRANCISCO DIVISION	
12	UNITED STATES OF AMERICA,	CASE NO. CR-10-0565 JSW (EDL)
13	Plaintiff,	STIPULATION AND [PROPOSED] ORDER AUTHORIZING TEMPORARY
14	V.	RELEASE OF PASSPORT TO COUNSEL
15	SOK WA CHONG VISEU,	
16	Defendant.	
17		
18	STIPULATION	
19	Defendant Sok Wa Chong Viseu has been on pretrial release since her initial appearance	
20	before the magistrate court on August 2, 2010. As a condition of her release, Ms. Viseu was	
21	required to surrender her United States passport to Pretrial Services. A further condition is that	
22	Ms. Viseu not travel outside the United States without the permission of the Court.	
23	Ms. Viseu's passport has expired. Because Ms. Viseu's elderly and ailing mother resides	
24	in Macau, near Hong Kong, Ms. Viseu wishes to renew her passport so that she can travel to visit	
25	her mother on short notice (with the Court's permission). In order to renew her passport, Ms.	
26	Viseu must surrender her expired passport to the National Passport Processing Center.	
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STIPULATION MODIFYING CONDITIONS OF RELEASE

Accordingly, Ms. Viseu wishes to obtain her expired passport from Pretrial Services in order to submit it to the National Passport Processing Center for renewal. Upon receiving a new passport, Ms. Viseu will surrender it to Pretrial Services.

Neither Pretrial Services nor the government objects to the temporary release of Ms.

Viseu's passport for the purpose described above, provided that the passport is released to defense counsel and defense counsel submits the passport directly to the National Passport Processing Center for renewal.

The parties thus agree and stipulate that Pretrial Services should be directed to produce Ms. Viseu's passport to undersigned defense counsel, and that defense counsel should thereafter deliver the passport to the National Passport Processing Center by mail along with an application for renewal. The parties further agree and stipulate that upon receiving a replacement passport, Ms. Viseu or her counsel shall deliver the passport to Pretrial Services within 48 hours.

IT IS SO STIPULATED.

DATED: January 3, 2013

/s/ Josh Cohen

JOSH COHEN

Attorney for OLGA VISEU

DATED: January 3, 2013

/s/ Deborah Douglas

DEBORAH DOUGLAS

Assistant United States Attorney

ORDER

By stipulation of the parties, and for good cause shown, it is hereby ORDERED that Pretrial Services shall return defendant Sok Wa Chong Viseu's passport to her counsel, Josh Cohen. Defense counsel shall deliver the passport directly to the National Passport Processing Center via mail for the sole and exclusive purpose of renewing the passport. Upon completion of this process and receipt of a new passport, Ms. Viseu or her counsel shall deliver the passport within 48 hours to Pretrial Services.

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1	All other conditions of release shall remain in effect.	
2	IT IS SO ORDERED.	
3	DATED: January 7, 2013	
4	ELIZABETH D. LAPORTE UNITED STATES MAGISTRATE JUDGE	
5	CIVITED STATES WAYOUSTRATE JODGE	
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	3 Case No. CR-10-0565 JSW STIPULATION MODIFYING CONDITIONS OF RELEASE	
	STIPULATION MODIFYING CONDITIONS OF RELEASE	